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**BY MESSENGER**

Bruce P. Beausejour, Esq.  
Verizon  
185 Franklin Street, Room 1800  
Boston, MA 02110

**Re: D.T.E. Docket No. 01-20 - Discovery Issues Raised by Verizon**

Dear Bruce:

I am writing in response to your June 18, 2001, letter which discussed AT&T's responses to certain information requests. AT&T stands by all of the responses that it has made and believes that all objections that it has made are valid and appropriate. However, in the spirit of compromise, AT&T intends to provide supplemental responses to some of Verizon's information requests.

With respect to the information requests discussed in paragraphs 5-10 of your letter, AT&T has now finished compiling information that will allow it to provide supplemental responses. We will serve and file those under separate cover.

With respect to the information requests discussed in paragraphs 3 & 4 of your letter, we are working to compile information that may allow AT&T to provide supplemental responses.

With respect to the information requests discussed in paragraph 1, we note that Verizon is taking inconsistent positions depending upon whether it is seeking or resisting discovery. The requests by Verizon referred to in paragraph 1 all seek information regarding AT&T's network. We objected on the ground that these requests are not reasonably calculated to lead to the discovery of admissible evidence, because this case involves Verizon-MA's forward-looking economic costs to provide UNEs and AT&T's own operational experience is not relevant. It is strange that you claim that our objections are "plainly without merit," given that Verizon has taken similar positions in this proceeding. For example, just yesterday Verizon responded to CC-VZ 10-9 with a very similar objection. That request asked whether "any of Verizon's current plant-in-service [is in use] beyond the economic lives [Verizon] proposes for depreciation in this case." Verizon objected, asserting that the request "is not reasonably calculated to lead to the discovery of admissible evidence" because Verizon's "historical plant-in-service does not form the basis of the forward-looking TELRIC investments underlying the UNE studies at issue in this proceeding." If Verizon's own existing network is not relevant to

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this case, it is hard to see how AT&T's network could possibly be relevant. To be clear: even though information about Verizon's existing network will often be relevant to this proceeding, especially given Verizon's heavy reliance in its own cost studies on historical information regarding its embedded costs, information about some facet of AT&T's network is not at all relevant here. Nonetheless, again in the spirit of compromise, we are in the process of determining whether we can provide supplemental information to some or all of the requests identified in your paragraph 1, and do so without a special study or major investigation.

AT&T will not, however, provide supplemental responses to all of the information requests mentioned in your letter.

With respect to the information requests discussed in paragraph 2 of your letter, you take issue with AT&T's objections to a series of information requests that concerned prior versions of the HAI model. The fact remains that prior versions of the HAI model are not at issue in the present docket, and therefore these requests are inappropriate and seek irrelevant information. We are only sponsoring the models filed in this proceeding, and other models filed at other times and in other jurisdictions are simply not relevant. Furthermore, these requests seek information that is not readily available, and would take a special study to compile. We do not have the resources to devote to compiling information that does not concern the merits of the issues in this proceeding. Thus, AT&T will not produce any further responses to them.

Finally, AT&T will also not provide any supplements to the responses that you discuss in the second to last paragraph of your letter. In that paragraph, you claim that Verizon "has concerns" about a number of responses, but do not provide any further explanation. AT&T believes that its original responses to those information requests were both accurate and complete. AT&T has no way of knowing what Verizon's "concerns" may be, and therefore need not and cannot respond to them.

Please call if you have any questions, or wish to discuss these matters further.

Very truly yours,

Kenneth W. Salinger

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